

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE NAMENDA DIRECT PURCHASER  
ANTITRUST LITIGATION

Civil Action No.: 1:15-CV-07488-CM-RWL

**DIRECT PURCHASER PLAINTIFFS' MOTION FOR LEAVE TO FILE A REPLY IN  
FURTHER SUPPORT OF THEIR MOTION IN LIMINE NO. 1 TO PRECLUDE  
FOREST FROM ASSERTING SUBJECTIVE BELIEFS CONCERNING THE '703  
PATENT THAT IT BLOCKED DURING DISCOVERY ON PRIVILEGE AND  
WORK-PRODUCT GROUNDS**

**PLEASE TAKE NOTICE** that Plaintiffs hereby move for leave to file a reply memorandum in further support of their Motion *in Limine* No. 1 to Preclude Forest from Asserting Subjective Beliefs Concerning the '703 Patent That It Blocked During Discovery on Privilege and Work-Product Grounds.

This Reply is warranted because Forest's Opposition to Plaintiffs' Mot. *in Limine* No. 1 is actually an untimely cross-motion *in limine* that contains new requests for relief, outside the scope of the relief sought in Plaintiffs' Mot. *in Limine* No. 1. These grounds are further set forth in the accompanying Proposed Reply Memorandum of Law, appended hereto as Exhibit 1.

Dated: June 17, 2019

Respectfully submitted,

/s/ Dan Litvin  
Dan Litvin

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 17, 2019, I electronically filed the above by CM/ECF system.

Respectfully submitted,

/s/ Dan Litvin

Dan Litvin